

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, SERIES UVALDE RANCH	§	CASE NO. 20-51083-rbk
	§	
DEBTOR	§	(Jointly Administered)

**KRISJENN RANCH, LLC, KRISJENN RANCH LLC, SERIES UVALDE
RANCH, AND KRISJENN RANCH, LLC, SERIES PIPELINE ROW'S
MOTION FOR ENTRY OF FINAL DECREE CLOSING CASES**

THIS MOTION SEEKS AN ORDER THAT MAY AVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY, AND YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN TWENTY-ONE (21) DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND DECIDE THE MOTION AT THE HEARING.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch LLC, Series Pipeline Row, LLC (the "Debtors"), the reorganized debtors in the above-referenced Chapter 11 proceeding, hereby moves this Court, pursuant to Fed. R. Bankr. P. 3022 and 11 U.S.C. §350(a), for entry of a final decree closing these Chapter 11 cases. The grounds for this motion are as follows:

SUMMARY

1. On April, 27, 2020, KrisJenn Ranch, LLC filed a voluntary petition under Chapter 11 of Title 11 of the Bankruptcy Code, 11 U.S.C. §§101–1330 et sq. (the "Bankruptcy Code") and the case has been fully administered. On February 28, 2022, this Court entered an

Order Confirming Debtor's Fourth Amended Substantially Consolidated Plan of Reorganization (the "Confirmed Plan") proposed by the Debtors in this proceeding.

2. There remain no outstanding motions, adversary proceedings, or contested matters. Likewise, the confirmation order is final and payments under the confirmed Chapter 11 plan have commenced. The Debtors request that a final decree closing this case be entered.

JURISDICTION AND AUTHORITY

3. This is a core proceeding. The Court has jurisdiction over both the subject matter and the parties under 28 U.S.C. §1334 and the standing order of reference.

4. The Court may grant the relief sought under 11 U.S.C. §350 and Fed. R. Bankr. P. 3022, which permit the Court to enter a final decree closing the case upon its own motion or on motion of a party in interest.

5. The Plan provides for the retention of jurisdiction by the Bankruptcy Court to enter a Final Decree under Bankruptcy Rule 3022 terminating the Chapter 11 case. Rule 3022 of the Federal Rules of Bankruptcy Procedure further provides that "after an estate is fully administered in a Chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case."

6. Under Section 1101(2) of the Bankruptcy Code, this case has been substantially consummated as distributions under the Confirmed Plan have commenced and continue to be distributed.

RELIEF REQUESTED

7. The Movant, by this Motion, asks the Court to take judicial notice of the Docket and note the existence of the confirmation order and absence of any pending activity.

8. Accordingly, it is appropriate that the Court enter a final order and decree declaring that this case is fully administered and close the case.

9. Equity suggests that the Court should enter its final decree promptly so that the former Debtors are not required to monitor the cases, pay fees, and the cases may otherwise be closed.

PRAYER

WHEREFORE PREMISES CONSIDERED, KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch LLC, Series Pipeline Row, requests this Court to enter a final decree closing Cases Numbers **20-50805**, **20-51083**, and **20-51084**, respectively, and grant any related relief justified in law or equity.

Dated: April 1, 2022

Respectfully submitted,

/s/ Ronald J. Smeberg
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ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on this the 1st day of April, 2022, true and correct copies of the foregoing motion were forwarded by U.S. first class mail, postage prepaid, on all parties listed on the attached Service List.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

DEBTOR

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Attn: Bankruptcy
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Rusk County
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